

A decorative graphic in the top left corner consisting of several overlapping triangles in shades of purple, teal, and orange.

Privacy Policy for Ticket Buyers

This privacy policy aims to give you information on how Purple Seven collects and processes your personal data.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies or notices and is not intended to override them.

Who is Purple Seven?

Purple Seven works with organisations to enhance your entertainment experience. Through our insights and software solutions we can improve organisations' understanding of the entertainment you want to attend, how often, and whether you have enjoyed your event. However, these services rely on our processing of your personal data.

We primarily receive information from the organisation which you enjoy entertainment through will collect your personal data, and as a part of this they will have their own privacy policy for you. However, we are aware that it is important for you to know who exactly we are, and we want you to be fully aware and happy about our relationship with you and what we will do with your data.

What is Purple Seven's Commitment to Data?


Purple Seven is committed to the highest standards of data protection.

We take our responsibilities under applicable data protection and privacy laws very seriously and intend to meet the stringent standards established by the General Data Protection Regulation (GDPR), and the UK's Data Protection Bill which will become the Data Protection Act 2018

More generally, we illustrate this by following the principles of data protection which ensure that we use data for a stated legal purpose and that we keep accurate data in a secure manner for a specified period of retention in line with the policy of the entertainment organisation you have visited, after which your personally identifiable data is deleted.

We may also retain data that is no longer personally identifiable for the purposes of statistical analysis.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

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We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

What Data Does Purple Seven Hold?

Purple Seven acts as a data processor on behalf of many cultural organisations and, as such, may hold personal data submitted by you when you purchase tickets from such organisations. Our software solutions register whether you have confirmed that you would like to receive marketing communications from such cultural organisations; therefore the marketing information that you receive from cultural organisations will only be sent with your consent and in the manner you allow it to be.

We may collect, use, store and transfer various kinds of personal data about you which we have grouped together as follows:

- ❑ **Identity** Data includes first name & last name
- ❑ **Contact** Data includes postal address, email address and telephone number.
- ❑ **Profile** Data includes the tickets you bought and the event you attended, price paid, seat bought, date of purchase, channel of purchase.
- ❑ **Marketing and Communications** Data includes your preferences in receiving marketing from the cultural organisation you attended and your communication preferences.
- ❑ **Membership and donations.** Data about any memberships you may have held or donations you have given to the organisation.

We also create, use and share Aggregated Data derived from your Profile or Contact data. This is not classified as personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you through the ticketing data (although we may through the Survey's we offer which is subject to a different Privacy Statement). Special Categories of Personal Data includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We do not collect any information about criminal convictions and offences.

How Does Purple Seven Collect Your Data?

Your data is passed to us from the cultural organisations from whom you have bought tickets using special software that is designed to keep an accurate record of your data.



How Does Purple Seven Use Your Data?

We will only use your personal data for purposes to help the cultural organisation get better and only when that work falls within the law and good practice. Most commonly, we will use your personal data in the following circumstances:

- ✔ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ✔ Where we need to comply with a legal or regulatory obligation.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>Statistical Analysis: Purple Seven will mask your personal data so that it is not easily or immediately identifiable as an individual in order to create an industry-wide dataset of arts attending behaviour. This helps the sector measure impact and performance. Where personal data is used for statistical purposes, certain of your rights under GDPR will not apply (Article 89).</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p>	<p>Necessary for our legitimate interests (Purple Seven processes personal data to produce statistical results and analysis regarding consumer behaviour in the arts industry).</p>
<p>Surveys: Purple Seven delivers post-show customer satisfaction surveys on behalf of theatres who wish to improve their service. Responses to these surveys are not linked to your other personal data.</p>	<p>Contact</p> <p>Survey Responses including Ethnicity where provided</p>	<p>Necessary for our legitimate interests (to assist our customers in understanding the popularity of shows and performance at their venues).</p>

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, you will be notified and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. We will not contact you for marketing purposes unless we are doing so on behalf of the organisation you have visited.

Disclosure of Your Personal Data

We may have to share your personal data with the external third parties set out below for the purposes set out in the table above.

- ✔ Service providers based in the UK who provide IT and system administration services. (e.g. organisation who provide server space which we may rent from them)
- ✔ Service providers based outside the EEA who provide software development services
- ✔ Service providers based in the UK who provide data analytics and insight services.
- ✔ HM Revenue & Customs, regulators and other based in the United Kingdom who require reporting of processing activities in certain circumstances.
- ✔ Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to access and process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We do not transfer your personal data outside the European Economic Area (EEA). Any data we hold is held within secure facilities in the EEA and we publish this information on our website and we inform our clients anytime we move the data to a different physical location.

What is Purple Seven's Level of Data Security?

Purple Seven has put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate business need to. They will only access and process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How Long Does Purple Seven Retain Personal Data For?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data can be requested from us by contacting the data privacy manager.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- ✔ **Request access to your personal data:** this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. This is commonly known as a "data subject access request".
- ✔ **Request correction of your personal data:** this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- ✔ **Request erasure of your personal data:** this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You can also ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with applicable law.
- ✔ **Object to processing of your personal data:** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- ✔ **Request restriction of processing of your personal data:** this enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- ✔ **Request transfer of your personal data:** we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

If you wish to exercise any of the rights set out above you will need to contact the organisation with whom you have given your data to. As a data processor we cannot divulge any data without the Data Controllers consent.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Each organisation whose data we process may have a different policy about this and you should contact them directly.

How Do I Unsubscribe?

If you do not wish to have your personal data used or to be contacted as a result of our services we offer then you must, in the first instance, contact the entertainment organisation you visited on whose behalf Purple Seven processes your personal data.

Changes to Our Policy

In the event of any changes being made to this policy, an update to this effect will be posted on this page. You should ensure that you review this policy from time to time.

To view our entry on the Commissioner's register please enter Z769796X at the following [link](#).

For any further information you can contact our support team via any of the following:

Contact: Data Privacy Manager

Email: privacy@purpleseven.com

Phone: +44 (0)203 0211 644

Post: Customer Support
Purple Seven
IC2.4-2.5 The TechnoCentre
Puma Way
Coventry
CV1 2TT